



EQUITY ACTION PLAN



U.S. Department of Housing and
Urban Development



U.S. DEPARTMENT OF HOUSING AND URBAN DEVELOPMENT
WASHINGTON, DC 20410

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Executive Summary

The U.S. Department of Housing and Urban Development's (HUD) mission is to create strong, sustainable, inclusive communities and quality affordable homes for all. Meeting the aspiration of this goal requires that HUD prioritizes people in communities otherwise underserved by federal programs. HUD is working to strengthen the housing market to bolster the economy and protect consumers; meet the need for quality affordable rental homes; utilize housing as a platform to improve quality of life; build inclusive and sustainable communities free from discrimination; and transform the way HUD does business.

While current HUD leadership recognizes the extraordinary legacy, mission, and potential the Department brings to building equitable communities across the nation, we also recognize several of HUD's core programs were implemented and operated for decades in a manner that enabled discriminatory practices against people of color and members of other protected class groups. The Biden-Harris Administration's HUD is eager to use HUD's authorities to reverse the deep-seated detriment caused by prior federal policies and prioritize equity in all HUD programs.

HUD's action plan responds to the request in Executive Order 13985 as implemented by the Office of Management and Budget to specifically address (1) procurement and (2) resources to the agency's civil rights unit, the Office of Fair Housing and Equal Opportunity (FHEO). Access to federal contracting opportunities can support economic growth and wealth building for members of underserved communities. HUD's fair housing and civil rights work has a broad scope and touches every person in this country. Furthermore, the underlying mission of FHEO is squarely focused on underserved communities by eliminating housing and lending discrimination against persons of color and other vulnerable populations.

Additionally, the action plan highlights activities to eliminate the racial homeownership gap, an important priority of the [Administration](#) as the root of these disparities is often traced to discriminatory policies and practices at the local, state, and national level, as well as discrimination in the private sector. HUD took a comprehensive look at the home-ownership life cycle and determined a broad set of opportunities in which HUD can play a role expanding homeownership opportunities. The final item in the action plan builds on ongoing efforts in HUD's homelessness assistance programs to promote equity in work to end homelessness. Homelessness affects people of all ages and races across the country, in urban, suburban, and rural areas, including tribal communities, but barriers can prevent resources from equitably reaching all those in need. The actions identified in this plan will bring greater equity within these programs to underserved communities.

This action plan responds to OMB's submission requirements; it is not a full picture of the work in which HUD staff is engaged to ensure equity throughout HUD's programs, policies, and practices. For example, a team explored opportunities for meaningful engagement with stakeholder groups and mechanisms to reduce barriers to regularly benefitting from the expertise of people with lived experience, which provides a foundation for future activities to bring lived experiences into HUD's decision-making processes. HUD's FY2022-2026 Strategic Plan identifies additional undertakings to promote equity, such as improving rental assistance to

address the need for affordable housing. HUD has embraced the opportunity presented by Executive Order 13985 to bring equity to the agency's internal and external activities.

Early Accomplishments

- Publication of an interim final rule, [Restoring Affirmatively Furthering Fair Housing Definitions and Certifications](#); publication of a proposed rule, [Restoring HUD's Discriminatory Effects Standard](#), that proposes to restore the 2013 discriminatory effects rule.
- Announced that HUD would administer and enforce the Fair Housing Act to prohibit sex discrimination on the basis of sexual orientation and gender identity, consistent with Title VII and the Supreme Court's decision in *Bostock v. Clayton County*, 590 U.S. ____ (2020).
- Updated HUD's [Language Access Plan](#) in October 2021.
- Initiated the Interagency Task Force on Property Appraisal and Valuation Equity ([PAVE](#)), co-chaired by Secretary Fudge.
- Entered into a [Memorandum of Understanding](#) with the Federal Housing Finance Agency on August 12, 2021, to enhance fair housing enforcement.
- [Mortgagee Letter 2021-12](#), *Eligibility Requirements for Certain Non-Permanent Resident Borrowers*.
- [Mortgagee Letter 2021-13](#), *Student Loan Payment Calculation of Monthly Obligation*.
- [Mortgagee Letter 2021-27](#), *Appraisal Fair Housing Compliance and Updated General Appraiser Requirements*, to address discrimination in the appraisal process.
- Launched a [FFB-Risk Sharing Initiative](#), which will bring much-needed capital to development of affordable rental housing that serves people and communities long disadvantaged by racial discrimination.
- Launching an innovative housing counseling [grant program](#) to expand access to HUD approved counseling services to HBCU & MSI communities and their constituencies and facilitate educational and employment opportunities for the next generation of HUD Certified Housing Counselors.
- Included equity in Notices of Funding Opportunities (NOFOs), for example: FY 2020 Housing Opportunities for Persons With AIDS (HOPWA) [Competitive Grant](#) and FY2021 CoC Program Competition [NOFO](#).
- Provided grantees with resources supporting equity, for example updated a series of [resources](#) to reduce barriers to serving transgender individuals experiencing homelessness.
- Initiated Coordinated Entry Equity Initiative pilot to support nine communities in improving housing outcomes and the human experience for Black, Brown, Indigenous and all people of color.
- Added equity component to research and evaluation, including Regulatory Impact Analyses; HUD's [Program Evaluation Policy](#); research priorities in PD&R's [Unsolicited Proposals](#) for Research Partnerships; and HUD's [Learning Agenda](#).
- Extended procurement small business outreach activities with organizations to reach underserved communities, including persons with disabilities, LGBTQ+ business owners, and American Indians.
- Began developing a framework to partner between federal agencies and communities, with potential support from philanthropy, to help local communities increase equity in deployment of federal funding.
- Staff initiatives include formation of a Knowledge Collaborative on Race, Diversity, Equity, and Inclusion in research in PD&R; diversity training for a staff-created Diversity and Office

Improvements Committee in PIH; and creation of a rotation program in OGC to enable career staff to spend focused time engaged in moving forward the HUD equity agenda.

Procurement

Barrier to Equitable Outcomes

HUD pursues a range of activities to meet the small business and small disadvantaged business goals set by the Small Business Administration (SBA). Yet, many entrepreneurs with appropriate skills and capacity have not successfully gained access to the federal procurement system. As the interagency community works to address system-wide challenges, HUD is focusing on widening the base of small businesses based on the socio-economic groups that appear under-represented in HUD's procurements.

Groups are identified under the Small Business Act as socially disadvantaged for having suffered the effects of discriminatory practices or similar invidious circumstances over which they have no control. Executive Order 13985 includes other groups that have experienced discrimination that may affect their ability to access capital and capture market opportunities. HUD has considered how its procurement outreach can connect with small, disadvantaged businesses and other entrepreneurs, such as those who identify as LGBTQ+, are of a religious minority, or have a disability.

Through the equity assessment process at HUD and other agencies, two sets of barriers have been identified. On the vendor side is difficulty navigating the complex process of the federal procurement system and identifying specific agency opportunities. On the agency side is improving market research and forecasting to match needs with small business capabilities.

Action and Intended Impact on Barrier

Input from internal and external stakeholders during the equity assessment indicated the need for more expansive outreach and support to small businesses underrepresented in the procurement space. HUD's Office of Small Disadvantaged Business Utilization (OSDBU) seeks to support greater data analytics; invest in technological improvements including a virtual matchmaking platform; and develop and implement training to educate small businesses about the federal procurement process. With more staff, OSDBU will be able to expand outreach efforts to connect with more community partners, help new businesses navigate the process, and expand the geographical diversity of HUD's supplier base. HUD's ongoing relationships with local communities also provide mechanisms to increase the awareness of opportunities and support development of pathways for small businesses. For example, staff in the Office of Field Policy and Management will conduct additional local outreach.

External outreach and support activities will be complemented by internal outreach and support activities. The equity assessment identified areas of communication and peer learning to pursue. Specific areas of focus are improving the forecasting descriptions to help small businesses identify appropriate opportunities (and making these forecasts easy for small businesses to locate) and working with program offices to widen the aperture when conducting market research. Improved acquisition planning is expected to yield higher quality market research, facilitate greater understanding of small business participation in the marketplace, and allow

more time to disseminate requirements to the small business community so businesses can better plan and prepare competitive proposals. HUD's Office of the Chief Procurement Officer (OCPO) will provide best practices to help offices develop requirements to ensure they do not unintentionally foreclose small business opportunities.

Recognizing the importance of using small, local businesses and creating opportunities for sustainable entrepreneurship to build and retain individual and community wealth, HUD is in a unique position in which it can encourage its grantees to work with local small businesses by sharing effective models from programs as varied as Choice Neighborhoods and CDBG-Disaster Recovery. HUD directly bolsters employment and economic opportunity for small businesses and local residents through Section 3 of the Housing and Urban Development Act, which creates a pathway for Section 3 businesses (owned by or hiring low-income individuals) to develop the capacity to pursue future federal contracting opportunities. HUD grantees also use HUD funding to support other small and local businesses to provide their services or products on an array of federally funded projects. HUD will partner with SBA to encourage entrepreneurship in public housing and Section 8 (Housing Choice Voucher) housing through community-based classes targeted to HUD-assisted residents and develop mechanisms to connect Section 3 businesses with contracting opportunities and federal programs.

Success requires going beyond data on small business contracting to identify what happens to small businesses after they receive a government contract. HUD will work with the interagency community to identify supports needed to ensure the sustainability of businesses, provide appropriate resources as they transition from small to medium businesses, and track success.

Tracking Progress

OSDBU will track attendees at outreach events to identify if expanded efforts are reaching new businesses and adjust strategies as needed to increase outreach to underrepresented groups. HUD will continue analyzing procurement data to track the number of small business vendors within each socio-economic category and dollar amounts of contracts to see if agency efforts are effective in reducing the identified barriers. With expected government-wide improvements in data collection, HUD will be able to further refine actions to reach small business owners who have the needed capabilities but have been unable to connect through the federal procurement system. As greater data resources become available, HUD will refine its strategies to expand the universe of small businesses owned by members of underserved communities that obtain access to HUD's procurement opportunities.

OCPO plans to implement a dashboard to track acquisition actions through their lifecycle to provide HUD's acquisition workforce with greater visibility into the contracting process. This will advance equity by tracking small business set-asides and identifying unplanned actions earlier, to enable OCPO and OSDBU to work with program offices to determine opportunities for small businesses.

Accountability

The federal small business contracting ecosystem provides several accountability mechanisms that enable the public to track HUD's progress on these actions. These include the annual [SBA](#) contracting scorecard and HUD's OSDBU's [Annual Report](#). Additionally, HUD's FY2022 – 2026 Strategic Plan includes working with SBA to support Section 3 businesses as they develop the capacities to compete for federal contracts.

Fair Housing and Civil Rights Resources

President Biden's [memorandum](#) on redressing our nation's history of discriminatory housing practices and policies recognizes the ongoing legacies of residential segregation and discrimination and the critical role of the federal government in overcoming this history of discrimination by enforcing civil rights and fair housing laws. HUD's Office of Fair Housing and Equal Opportunity (FHEO) is the office focused on advancing civil rights, receiving legal support from the Office of General Counsel fair housing and regional counsel. FHEO largely has authority to carry out HUD's responsibilities under the Fair Housing Act through three primary functions: (1) executing an administrative complaint process; (2) exercising Secretarial authority to independently commence investigations and bring complaints under the Fair Housing Act and initiating compliance reviews of recipients of federal financial assistance; and (3) administering the Fair Housing Act's mandate that all programs and activities related to housing and urban development Affirmatively Further Fair Housing (AFFH).

Barrier to Equitable Outcomes

FHEO funds four programs to support education on and enforcement of civil rights: the Fair Housing Initiatives Program (FHIP) gives grants to private fair housing organizations; the Fair Housing Assistance Program (FHAP) supports state and local civil rights enforcement agencies; the National Fair Housing Training Academy (NFHTA) offers training on fair housing investigation and conciliation techniques to FHIP and FHAP partners; and the Limited English Proficiency Initiative (LEPI) provides English translation and interpretation services. Funding for these programs has failed to increase to meet the need for fair housing enforcement.

Discrimination reports by members of the public to FHEO and FHAP-funded organizations have trended upward for years and recently saw a sharp increase from 13,590 in FY2017 to 24,200 in FY2021. The proportion of contacts that triggers FHEO's obligation to file a Fair Housing Act complaint for investigation remains steady around 17 percent. A five-year record high of 8,402 investigations were initiated in FY2021. Meanwhile, the number of FHAP-funded organizations has significantly dropped from 102 in FY2010 to 76 at the end of FY2020. FHIP-funded organizations also have decreased from 141 in FY2010 to 120 currently. The decrease means fewer private local and state organizations are investigating housing discrimination complaints and enforcing fair housing laws. The planned increase in education and outreach activities along with implementation of the Bostock decision are likely to result in more filed complaints.

While discrimination has continued, staffing and funding resources have either not kept pace or declined, creating barriers for HUD in resolving complaints in a timely manner for all parties involved. In 2003, FHEO had 744 full-time equivalents (FTEs), which fell to 577 FTEs by FY2010 and reached a low of 435 in FY2019. FHEO regained some capacity with an increase to 534 FTEs in FY2021 but remains well below prior years' staffing levels. The staffing decrease has challenged HUD's ability to keep pace with both the number of complaints filed by the public for violations of their rights and the completion of statutorily required fact-finding investigations.

Action and Intended Impact on Barrier

The President's FY2022 budget request invests in FHEO capacity, proposing a 16.7 percent increase for FHEO salaries and expenses (S&E) to increase staff to 624 FTE. Having diverse staff representative of the customer base that experiences housing discrimination, including people of color and people with disabilities; training in culturally competent communications; and greater awareness of social services will further advance equity in FHEO service delivery. Increased S&E funds are needed to keep pace with HUD's obligations to process, investigate and resolve fair housing complaints and other civil right matters and to improve capacity to pursue Secretary-initiated investigations and compliance reviews. These do not depend on public filing of a complaint, often involve complex, systemic fair housing issues, and require extensive FHEO and OGC staff time. Investing in FHEO capacity will be a continued priority in future budgets.

In addition to enforcement activities, FHEO has issued guidance and new rules to strengthen the prohibition against discrimination in housing. As stated in the interim final rule on AFFH, HUD intends to undertake a comprehensive rulemaking to implement the Fair Housing Act's mandate to Affirmatively Further Fair Housing. The public will be given an opportunity to weigh in on any revised AFFH rule to ensure underserved communities will benefit from and grantees understand their obligations under any final regulatory framework.

Additional rulemaking actions HUD plans to undertake to promote equity include: Advanced Notice of Proposed Rule Making (ANPRM): Nondiscrimination Based on Disability in Federally--Assisted Programs and Activities of HUD updating regulations under Section 504 of the Rehabilitation Act; ANPRM: Adoption of Accessibility Standard to Ensure that Multifamily Housing Covered by the Fair Housing Act is Accessible to Individuals with Disabilities to seek public comment on whether HUD should adopt a national accessibility standard for complying with the Fair Housing Act's design and construction requirements; and Notice of Proposed Rule Making: Adoption of Updated Accessibility Standard for the Architectural Barriers Act (ABA).

Tracking Progress

HUD will evaluate success by tracking the number of (1) Fair Housing Act complaints received, processed, and closed, which is provided in FHEO's annual reports; (2) FHIP- and FHAP-funded organizations working at the state and local level; (3) cases referred by FHIP organizations; (4) cases processed by FHAP organizations; and (5) FHIP/FHAP practitioners attending NFHTA trainings. HUD is pursuing tracking measures that will analyze trends in filed fair housing complaints on a more granular level to reveal causes for trends seen from public filings.

As aggressive measures are administered to increase FTEs, FHEO will use benchmarks and track its hiring rates. FHEO also will institute measures to increase retention rates. The capacity to pursue Secretary-initiated complaints, as measured through staffing and resources metrics, is another important indicator of HUD's ability to address discriminatory activities at a larger level. For purposes of implementing the AFFH Interim Final Rule, HUD will track the technical assistance provided to members of the public, HUD funded grantees, and stakeholder organizations.

Accountability

HUD's Strategic Plan includes several milestones related to FHEO's activities to empower individuals and reduce discrimination in the housing market, which will ensure public accountability. HUD will engage in stakeholder outreach to those with a variety of viewpoints to ensure its planned activities meet communities' needs.

Homeownership

Barrier to Equitable Outcomes

Homeownership is often a significant component of household wealth, especially for households of color. Homeownership opportunities influence where and how households live, which in turn affect access to community investments and amenities. Yet access to homeownership is not equitable nor is wealth accrual driven by homeownership. In the second quarter of 2019, the homeownership rates for white, Black, and Latino households were 73.1 percent, 40.6 percent, and 46.6 percent respectively – the largest differentials in fifty years. Similarly, in 2019, the median household wealth for white, Black, and Latino households was \$189,100, \$24,100, and \$36,050 respectively.¹ Other underserved groups face significant barriers to realizing the benefits of homeownership. [Freddie Mac](#) found the homeownership rate of LGBTQ+ households was 49 percent, far lower than the national average of 64 percent. Compounding, intersectional discrimination is likely for LGBTQ+ households of color; a vast majority of Black LGBTQ+ home seekers in Freddie Mac’s study feared housing discrimination based on both their sexual orientation (70 percent) and their race/ethnicity (89 percent). Furthermore, persons with physical disabilities [face difficulties](#) in finding accessible housing opportunities.

In conducting an equity assessment, the cross-office HUD team looked broadly at the homeownership lifecycle rather than focusing on a single HUD program. This approach allowed the team to find multiple opportunities for reducing the racial homeownership gap. In partnership with HUD’s Customer Experience team, staff spoke with Black and Hispanic individuals about their knowledge, beliefs, and experiences related to credit and purchasing a home. Focus on this earlier stage in the homebuying process was selected to inform a range of activities, including asset building efforts, financial empowerment strategies, down payment assistance from a range of governmental and nonprofit sources, and fair housing and fair lending enforcement and outreach.

Action and Intended Impact on Barrier

HUD is working to eliminate the racial homeownership gap through a range of actions and within many different programs, along with partnerships with federal and non-federal organizations. These include:

- Federal Housing Administration (FHA) activities to maximize homeownership for creditworthy first-time homebuyers and preserve homeownership for existing homeowners. These include improving the efficiency of the FHA program by leveraging technologies and removing perceived bias of the program so individuals, lenders, and others can use it more with first time, lower income home buyers.
- Increased engagement with non-traditional lenders, including community-based institutions, to better reach underserved communities through Community Planning and Development (CPD) grant programs like HOME Investment Partnership.

¹ Joint Center for Housing Studies (JCHS). [The State of the Nation’s Housing: 2021](#). Joint Center for Housing Studies, Harvard University, 2021.

- Continued analysis into mechanisms to increase the availability of small-dollar mortgage loans by addressing the financial and operational barriers limiting origination of these loans.
- Office of Native American Programs' Office of Loan Guarantee activities to increase residential mortgage lending on tribal trust lands, including increased lender outreach and information modernization.
- Efforts to ensure manufactured housing is a thriving source of affordable, quality, durable, and safe housing for Americans include implementing up-to-date Manufactured Housing Construction and Safety Standards.
- Expanding access to financing for affordable housing types like manufactured housing through updates to the Title I program.
- Providing increased support to individuals through culturally responsive and linguistically competent housing counseling; targeted outreach to historically underserved populations; and updated tools to enhance the customer experience and improve equitable access to housing counseling.
- Improving asset and credit building for renters interested in transitioning to homeownership.
- Implementing actions to reduce bias in home appraisals as identified by PAVE.
- Applying knowledge gains from the outreach pilot to individuals on access to credit to inform program design across relevant program areas.
- Proposing a 40-Year Term for Loan Modifications Rule, currently under OMB review, which will allow mortgagees to provide borrowers in default with a loan modification for up to 480 months to help borrowers reduce monthly mortgage payments and retain their homes.

A sufficient supply of affordable housing across a range of income levels and locations to meet consumers' needs is a critical component to improving access to homeownership. HUD is working with federal partners to identify opportunities to support an increase in housing supply. As a first step, HUD is taking the following actions:

- Expanding the exclusive listing period for HUD Real Estate Owned homes from 15 days to 30 to increase the time owner-occupants, HUD-approved nonprofits, and governmental entities can view and bid on properties without competing with investor purchasers.
- Enhancing the Claims Without Conveyance of Title program to provide an exclusive period for owner-occupants, HUD-approved nonprofits, and governmental entities to bid on properties prior to conveyance to HUD, reintroducing these affordable properties into the housing supply more quickly.
- Carrying out note sales of vacant properties with a set-aside for mission driven non-profits that will rehabilitate these properties for affordable homeownership and contribute to community revitalization.

Tracking Progress

HUD will continue to track a range of indicators that would reflect an increase in sustainable homeownership by Black and Hispanic households that reduces the racial homeownership gap. Monitoring includes:

- Data on loan borrowers to determine changes in the numbers and percentages of Black and Hispanic households that access FHA-insured loans and the rest of the mortgage market.
- FHA lending activity in underserved markets in relation to other mortgage market participation in these areas to enhance reporting of potential Black and Hispanic households

served particularly where demographics of borrowers are not reported. FHA will also monitor servicer portfolios to assess loss mitigation actions on seriously delinquent (90+ days) mortgages in these communities.

- Demographics of borrowers seeking FHA financing who were denied loans that received an accept from TOTAL Mortgage Scorecard, HUD's system for evaluating a loan applicant's overall credit worthiness.
- Serious default data across racial homeownership profiles.
- Accessible housing rates through the American Housing Survey, to determine if the housing stock is becoming more accessible for homeowners with mobility disabilities.

The Office of Housing Counseling will analyze data from HUD 9902 counseling reports, campaign analytics, and program performance reviews to evaluate the effectiveness of its activities to reduce barriers to effective housing counseling services.

Accountability

HUD currently has several mechanisms for accountability, including the Annual Report to Congress on the financial status of the FHA's Mutual Mortgage Insurance Fund, which contains data on the race of borrowers; and the FY2022-2026 Strategic Plan, which contains specific performance indicators across programs and is aligned with HUD's overall equity objectives.

Homelessness

HUD's [Point-in-Time count](#), which counts sheltered and unsheltered people experiencing homelessness on one night every year, found 580,466 people were living in emergency shelters, transitional housing programs, or in unsheltered locations on a given night in January 2020. National aggregate [data](#) in 2018 found over 1.44 million people experienced sheltered homelessness over the course of a year. The pandemic has likely increased housing instability. Reducing the number of people experiencing homelessness poses a challenge in an environment in which [7.77 million households](#) earning 50 percent or less of area median income are paying more than one-half of their income for rent and/or living in severely inadequate conditions. These households may be one paycheck away from losing their housing. As the Administration works to increase housing stability for all households, the needs of individuals and families who currently don't have a safe place to sleep at night continues to be a pressing problem.

Barrier to Equitable Outcomes

The experience of homelessness is not limited to one group or geography. Homelessness is experienced in cities, suburbs, rural areas, and tribal lands; across races and ethnicities; by individuals and families; young and old; male, female, transgender, and gender non-conforming. However, some groups are less likely to have safe access to homeless shelters and some experience homelessness for longer periods. In the [2020 Annual Homeless Assessment Report \(AHAR\)](#), people identifying as Black or African American accounted for 39 percent of all people experiencing homelessness but are 12 percent of the U.S. population. More than one-half of transgender people experiencing homelessness are unsheltered. Individuals with disabilities experiencing chronic homelessness compose nearly [25 percent](#) of all individuals experiencing homelessness. Assessment tools, prioritization processes, and general practices within coordinated entry systems (CES) were originally established to ensure the most vulnerable among those experiencing homelessness were not left out. Yet Black people, other people of color, people with disabilities, and LGBTQ+-identified people continue to have longer periods of homelessness, longer times to be housed, and higher rates of returns to homelessness.

Action and Intended Impact on Barrier

HUD's activities build on several years of work within the Office of Special Needs Assistance Programs (SNAPS) to support greater equity in the provision of homeless assistance. For example, HUD produced a set of racial equity resources, data toolkits, and research reports to help communities better understand and address the overrepresentation of people of color among those experiencing homelessness. Other actions include:

- A second cohort of Continuums of Care (CoCs) will work together in the "Coordinated Entry Equity Demonstration" to design more equitable CES processes on assessment and prioritization to significantly improve the Homeless Response System experience and housing stability outcomes for all people of color. Best practices from the demonstration will be shared with the larger homeless assistance community.
- Leverage lessons from the Youth Homelessness Demonstration Program, which required communities to involve youth in decision making. Best practices on identifying and

supporting youth to serve as advocates and experts and developing tools informed by young people with lived experience to address youth homelessness locally will be shared.

- Partner with U.S. Interagency Council on Homelessness (USICH) and other agencies to reduce entries into homelessness from foster care and criminal justice and other institutions.
- Support the USICH in implementing the Federal Strategic Plan to prevent and end homelessness.
- Improve the collection of (1) gender identity data and (2) race and ethnicity data in both what information is collected and how it is collected through dedicated teams of people with lived experience, advocacy organizations, researchers, technical assistance providers, and HUD staff. The goal is to collect data in a culturally sensitive and trauma-informed way and ensures data are not used to disenfranchise people. Improved data collection will enable greater awareness of barriers and effective actions.
- Support partners to create tailored, equitable solutions for individuals' needs informed by their lived experiences by building on prior pilot programs that bring people with lived experience into the decision-making process – both with federal funding decisions and local program design decisions.
- Provide technical assistance and guidance to assist communities in implementing and improving CES involving client-focused approaches and strategies that center racial equity.
- Further implement equity in Notices of Funding Opportunity (NOFO).
- Continue to implement Tribal participation in the CoC program pursuant to the Consolidated Appropriations Act, 2021, which allows Indian Tribes and Tribally Designated Housing Entities to participate in the CoC Program. HUD conducted two Tribal Consultation sessions and presented a webinar for existing CoCs on including Indian Tribes and TDHEs. SNAPS will begin to offer direct TA assistance to Indian Tribes and TDHEs in 2022. Resources may address how to overcome data challenges, making coordinated entry processes inclusive of tribes and culturally responsive; and tribes forming local continuum of care.

Tracking Progress

Improve data collection through efforts to update the Homeless Management Information System (HMIS) data collection requirements for race, ethnicity, and sexual orientation and gender identity. This will enable HUD to better track progress in equitably serving people experiencing homelessness. The data, addressing a range of demographic characteristics, are published annually in the AHAR to enable ongoing tracking of progress to serve people experiencing homelessness more equitably. A racial equity analysis [tool, developed by a technical assistance provider](#), provides data on individual CoCs. It does not capture change over time but offers a way to understand the population experiencing homelessness and how that relates to the population overall.

The communities participating in the Coordinated Entry Equity Initiative are implementing strategies in their prioritization and assessment systems to improve outcomes for people of color. Over the next twelve months, SNAPS will track progress of the eight communities that participated in the first Initiative. Each community will report on their exits to permanent housing, returns to homelessness, first time homeless and racial/ethnic system proportionality.

Accountability

The Annual Report to Congress provides one means of accountability. NOFOs and awardees are publicly available, enabling public review of efforts to increase equity across a range of underserved communities through grant awards. Regular engagement with grantees and people experiencing homelessness occurs through bi-weekly office hours, and participation in conferences and panels provides SNAPS with an opportunity to receive direct feedback.